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LOWENSTEIN, SANDLER, KOHL, FISHER & BOYLAN

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW
65 LIVINGSTON AVENUE
ROSELAND, NEW JERSEY

07068-1791

TELEPHONE (973) 992-8700

FACSIMILE (973) 992-5820

SOMERVILLE OFFICE

TELEPHONE (908) 526-3300

FACSIMILE (908) 526-9173

ALAN V. LOWENSTEIN
RICHARD M. SANDLER
BENEDICT M. KOHL
ARNOLD FISHER
JOSEPH LEVOW STEINBERG
MATTHEW P. BOYLAN
BRUCE D. SHOULSON
JOHN R. MACKAY 2ND
MARTIN R. GOODMAN
JOHN D. SCHUPPER
STEPHEN N. DERMER
MICHAEL L. RODBURG
ALLEN B. LEVITHAN
R. BARRY STIGER
GREGORY B. REILLY
PETER H. EHRENBERG
STEVEN B. FUERST
THEODORE V. WELLS, JR.
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ASHLEY STEINHART
DOUGLAS S. EAKELLEY
RICHARD D. WILKINSON

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JEFFREY B. GRACER

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STEVEN E. SIESSER
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STEVEN M. HECHT
GEORGE W. ARNETT, III
ANDREA L. WOLFF
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ADWOA AYO SANDERSON
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MAURICIO F. PAEZ
JACQUELINE C. ROMERO
ERIC DAVID WEINSTOCK
ELI S. GOLDBERG
MICHAEL T. HUGHES
ELLEN M. JURAN
JULIE LEVINSON WERNER
A. MATTHEW BOXER

OF COUNSEL

LINDA PICKERING
ROBERT L. KRAKOWER
NORMAN W. SPINDEL

STUART S. YUSEM
HARVEY SMITH
DAVID E. ALPERT

December 16, 1997

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jeffrey R. Morgan
Litigation Analyst
Environmental Claims Department
Risk Enterprise Management, Ltd.
59 Maiden Lane
New York, New York 10038

**Re: Potential Claim for Environmental Damage in the
Coeur d'Alene Basin, Northern Idaho
Insured: Group R Co., Inc.
Claim No.: 087-519989
Policy Nos.: HEC 4344274
HEC 4763007
HEC 4763461
HEC 4973371 and
GA 996264**

Dear Mr. Morgan:

Thank you for your letter of December 1, 1997, in which you acknowledge notice of the above-referenced claim on behalf of The Home Insurance Companies ("Home"). Most of the information you seek in your letter can be found in Group R's written response to U.S. EPA's 104(e) Request for Information enclosed herewith ("Group R's 104(e) Response"). Consequently, although we have responded below to each of the questions posed in your letter, most of those responses will refer you to Group R's 104(e) Response. If you wish to receive

M2377/59
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LS 003814

GRP "R" CDA dm - 0262

December 16, 1997

copies of the documents included in that response, please contact me or Michael David Lichtenstein of this office.

1. Has Group R ever owned, leased or controlled all or any portion of the allegedly contaminated site? Is so, please provide us with the particulars, including when and what interest it was. Also, please provide copies of any studies, reports, evaluations and recommendations made with respect to disposal of waste streams treated, stored or disposed of at the site.

RESPONSE: See Group R's 104(e) Response.

2. Has Group R ever participated in the management or operation of the site or has it provided technical assistance or information regarding storage, disposal or treatment of hazardous substances at the site? If so, please describe each such action and indicate when it happened. If not, please describe all visits to the site by Group R's personnel, identifying who made the visits, when, and what was learned from each visit about the site's condition and operation.

RESPONSE: See Group R's 104(e) Response.

3. If the site was used for waste disposal, storage or treatment prior to Group R's involvement, when and how did Group R learn about the site and its waste-related activities?

RESPONSE: See Group R's 104(e) Response.

4. Prior to selecting the site, did Group R have any communication with any governmental agencies about the site, the waste Group R ultimately sent to the site or the suitability of the site for waste it sent? If so, please state what those communications were and when they took place. What other inquiries by Group R preceded its decision to send hazardous substances there and what was learned from each?

RESPONSE: This matter is still in the preliminary stages and Group R is continuing to investigate this matter. Currently, Group R is not aware of any information responsive to this request. If Group R becomes aware of any additional relevant information, we will provide it to you.

5. Has Group R at any time made any inquiries regarding the status of any permits and other regulatory authorizations for the site? If so, when were the inquiries made and what was learned?

RESPONSE: Group R is unaware of any state, federal or other environmental violations issued to Golconda Lead Mines, Inc. ("Golconda"), or its successors, concerning the operations at the site.

LS 003815

December 16, 1997

6. If Group R was a generator for the site, please state all substances, whether or not hazardous, that Group R caused to be sent to the site, the quantities of each substance sent, the time periods during which each substance was sent and the identity of those who transported each of the substances to the site.

RESPONSE: The allegations against Group R are stated in the proposed Amended Complaints which have previously been provided to you. As we understand the claims, it is alleged that tailings generated as a result of mining and milling activity were disposed of within and around the south fork of the Coeur d'Alene River. See also, Group R's 104(e) Response.

7. Has the contamination affected the site's soil, groundwater or both?

RESPONSE: See response to question no. 6.

8. Are any of the substances that entered the site ones that Group R caused to be sent to the site? If so, what are they?

RESPONSE: See response to question no. 6.

9. Are you aware of any other substances which have contaminated the site? When and how were the contaminants released into the site? When and how did Group R first learn of the contamination?

RESPONSE: Other than the information previously provided, Group R has no additional information.

10. To your knowledge, are contaminants continuing to enter the site soil or groundwater? Have the contaminants migrated off-site or are they likely to do so?

RESPONSE: See response to question no. 9.

11. What steps have been taken to prevent further contamination and to contain and clean up the contamination that already exists?

RESPONSE: It is Group R's understanding that a number of removal actions have been conducted pursuant to two ACOs. Group R has not been asked to participate, and in fact has not participated, in those efforts and we do not have specific information regarding those efforts at this time. If we obtain any additional information, we will forward it to you.

12. Please identify all government agencies that are investigating, or have investigated, waste disposal practices at the site. When and how did Group R first learn that waste practices at the site were under investigation by a governmental agency?

LS 003816

December 16, 1997

RESPONSE: The United State Environmental Protection Agency is conducting an investigation of the site. In addition, we believe that the Secretary of the Interior, Regional Director of the U.S. Fish and Wildlife Service, Secretary of Agriculture and USDA-Forest Service are involved as trustees of certain natural resources within the Coeur d'Alene Basin.

13. Please make available for review any invoices, manifests and contracts relating to the site and any brochures or other documents that provide information about the site or its operations.

RESPONSE: See Group R's 104(e) Response.

We will continue to keep you updated as to the progress of this matter and we look forward to receiving a timely coverage determination.

If you have any questions, or require any additional information, please do not hesitate to contact me or Michael Lichtenstein of this office.

Very truly yours,



David M. Wissert

DMW:dmw

Enclosures

cc: Michael David Lichtenstein, Esq. (w/o encls.)

LS 003817

LOWE, STEIN, SANDLER, KOHL, FISHER & BOYLAN

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW
65 LIVINGSTON AVENUE
ROSELAND, NEW JERSEY

07068-1791

TELEPHONE (201) 992-8700

FACSIMILE (201) 992-5820

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MAURICIO F. PACE
JACQUELINE C. ROMERO
ERIC DAVID WEINSTOCK
ELI S. GOLDBERG
MICHAEL T. HUGHES

*PA BAR ONLY
**NY BAR ONLY

OF COUNSEL

LINDA PICKERING
ROBERT L. KRAKOWER
NORMAN W. SPINDEL

STUART S. YUSEM
HARVEY SMITH
DAVID E. ALPERT

July 25, 1997

VIA FEDERAL EXPRESS

Clifford J. Villa
U.S. Environmental Protection Agency, ORC-158
Office of Regional Counsel
1200 Sixth Avenue
Seattle, WA 98101

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Coeur d'Alene Basin, Northern Idaho

Dear Mr. Villa:

Enclosed please find the responses of Group R Co., Inc., The Marmon Corporation and The Marmon Group, Inc. to the referenced information request. Documents responsive to the request are enclosed and bates numbered LS 00001 - LS 002521. A privilege log is also enclosed. Due to time constraints, we are unable to provide you with a signed declaration for each of the responses at this time. However, we anticipate forwarding signed declarations to you next week. If you have any questions, please feel free to contact me.

Very truly yours,


Michael David Lichtenstein

MDL:nap
Enclosures
cc: Elizabeth Loeb, Esq. (w/out encls.)

M2377/59
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LS 003818

GRP "R" CDA dm - 0266

INTRODUCTION

This document constitutes the response of Group R Co., Inc. ("Group R Co.") to an information request received from the U.S. EPA on or about July 2, 1997. Pursuant to agreement with U.S. Department of Justice attorney Elizabeth Loeb, this response is to be served on or before July 25, 1997. The information contained herein was derived solely from historical documents currently within the possession and control of Group R Co. Group R Co. has made a good faith effort to understand and interpret the documents in order to be responsive to the specific questions asked by U.S. EPA. However, the "facts" set forth in this response are not based on personal knowledge of anyone currently employed by Group R Co. and Group R Co. reserves the right to supplement or amend these answers should new and verifiable information contradict or require modifications to the interpretation given to the available documents.

GENERAL OBJECTIONS

1. While Group R Co. recognizes that the U.S. EPA is under a court-ordered deadline for making decisions concerning the addition of parties to ongoing litigation related to the Coeur d'Alene Basin, Group R Co. objects to the minimal amount of time which it was provided to research and prepare responses to this information request. Group R Co. has made its best efforts in the limited amount of time provided to accurately respond to this request.

2. The information relied upon to respond to this information request was gathered solely from historical documents maintained by Group R Co. Given the time limits for answering this request, it is unreasonable and unduly burdensome (as well as practically impossible) to list all documents relied upon in preparation of each answer. However, all documents relied upon to prepare the answers have been provided herewith. The documents provided have been organized by the number of the question to which they respond. However, the fact that a particular document has been identified as responsive to a particular question or questions does not mean that it does not contain information relevant to other questions and should not be taken as an admission that Group R Co. has any liability for the current condition of the Coeur d'Alene Basin.

3. Group R Co. objects to the definition of the term "You" or "Respondent" on the grounds that it is overbroad and calls for a legal conclusion as to what are "predecessor or successor corporations or companies." Notwithstanding this objection, Group R Co. will provide information relating to the activities of Golconda Lead Mines, Inc., Golconda Mining Corporation, Golconda Corporation, RegO Company and The RegO Group, Inc. when responding to this information request. In so doing, Group R Co. expressly preserves the legal and factual argument that (a) Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are not legal or factual predecessors of RegO Company, The RegO Group, Inc. and Group R Co. and (b) RegO Company, The RegO Group, Inc. and Group R Co. are not legal or factual successors of Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation.

M2377/59
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LS 003819

4. Group R Co. objects to the instruction requiring it to seek out former employees or agents as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

5. Group R Co. objects to the instruction requiring it to continually supplement its response as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

6. Group R Co. will provide a privilege log for any responsive documents that it has not produced as quickly as practically possible given the short time frame for responding.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. Provide the full legal name and mailing address of the Respondent.

**Group R Co., Inc.
225 West Washington Street
Chicago, IL 60606
Attn. Robert W. Webb, Esq.**

b. For each person answering these questions on behalf of Respondent, provide:

These responses were prepared by Group R Co.'s counsel.

i. full name;

Lowenstein, Sandler, Kohl, Fisher & Boylan

ii. title;

N/A.

iii. business address;

**65 Livingston Avenue
Roseland, NJ 07068**

iv. business telephone number and FAX machine number.

(973) 992-8700 (phone)

(973) 992-5820 (fax)

- c. If Respondent wishes to designate an individual for all future correspondence concerning this Facility, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.

Michael L. Rodburg, Esq.
Lowenstein, Sandler, Kohl, Fisher & Boylan
65 Livingston Avenue
Roseland, NJ 07068
(973) 992-8700 (phone)
(973) 992-5820 (fax)

- d. State every address within the Coeur d'Alene Basin at which the Respondent conducted business during the period being investigated¹.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, Golconda Lead Mines, Inc. owned and operated a mine and a mill located north of the Osburn fault, between Wallace and Mullan, Idaho.

- e. State the dates during which it conducted business at each such location.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, Golconda Lead Mines, Inc. operated the mine from approximately 1927 - 1957 and the mill from approximately 1928 - 1960.

- f. Describe the nature of Respondent's current business at each such location, including, but not limited to, a brief description of the major products or services Respondent manufactures or provides.

Group R Co. objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, the mine and mill were sold to Harry F. Magnuson on December 30, 1976. Group R Co. is without knowledge as to whether any operations are still conducted there.

- g. List the Standard Industrial Classification (SIC) code for the business at each location.

Group R Co. is without knowledge as to the SIC code utilized by Golconda Lead Mines, Inc. or by any subsequent entity.

¹ If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

h. Describe the nature of the Respondent's business at each location during the period being investigated.

Golconda Lead Mines, Inc. operated a mine and a mill within the Coeur d'Alene mining district from approximately 1927 - 1960. After that time, Golconda Lead Mines, Inc. and Golconda Mining Corporation (beginning in 1962) apparently ceased active mining operations and limited activity to the collection of mining properties through direct land purchases and the acquisition of stock in companies holding land within the Coeur d'Alene mining district. Golconda Mining Corporation also appears to have conducted limited exploratory activities within the Coeur d'Alene mining district to protect unpatented claims that it owned and that were owned by companies in which it owned stock. On December 30, 1976, Golconda Corporation appears to have sold all of its mining assets located within the Coeur d'Alene mining district to Harry F. Magnuson.

2. Ownership Interests and Other Activities within the Coeur d'Alene Basin

a. Provide all documents relating to the following activities occurring within the Coeur d'Alene Basin:

i. Your ownership or leasing of mines;

Documents related to ownership or leasing of mines by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

ii. Your operation of mines;

Documents related to the operation of a mine by Golconda Lead Mines, Inc. are being provided herewith.

iii. Your ownership or leasing of mining claims and patents;

Documents related to the ownership of mining claims or patents by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

iv. Your ownership or leasing of mills, smelter complexes, or other facilities in which ore is processed or refined;

Documents related to the ownership and/or leasing of a mill, in which ore was processed and/or refined, by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are provided herewith.

v. Your operation of mills, smelter complexes, or other facilities in which ore is processed or refined;

Documents related to the operation of a mill in which ore was processed and/or refined by Golconda Lead Mines, Inc. are provided herewith.

vi. Your transportation of ore, mining wastes, or other materials related to mining activities;

No documents responsive to this request were discovered during the search conducted on behalf of Group R Co.

vii. Information concerning the generation, use, purchase, treatment, processing, refinement, discharge, storage, disposal, placement, or other handling of mining wastes and/or materials at, or transportation of mining wastes and/or materials to, the Coeur d'Alene Basin;

No documents responsive to this request were discovered during the search conducted on behalf of Group R Co.

viii. Your ownership or leasing of real property where mine tailings and other mining waste have been discharged, deposited, stored, disposed of, or placed, or otherwise come to be located.

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

b. Provide all environmental studies and/or audits regarding your involvement in the Coeur d'Alene Basin.

Group R Co. objects to the term "environmental studies and/or audits" as vague and ambiguous. Notwithstanding this objection, no documents related to this request were discovered during the search conducted on behalf of Group R Co.

c. Provide all documents related to any activities of the following entities in the Coeur d'Alene Basin:

Group R Co. objects to this request on the grounds that searching for documents related to the mining activities of the entities listed below in question 2(c)(i) - (xiv) is unduly burdensome and beyond the scope of EPA's authority pursuant to section 104(e) of CERCLA. Notwithstanding this objection, Group R Co. did discover certain documents during its document search that are responsive to this request and those documents are provided herewith.

i. ASARCO, Inc. and all predecessors, successors, subsidiaries, and affiliates;

- ii. Hecla Mining Company and all predecessors, successors, subsidiaries, and affiliates;
 - iii. Bunker Hill Limited Partnership and all predecessors, successors, subsidiaries, and affiliates;
 - iv. Sullivan Mining Company and all predecessors, successors, subsidiaries, and affiliates;
 - v. Gulf USA Corporation, formerly known as Gulf Resources & Chemical Corporation and all predecessors, successors, subsidiaries, and affiliates;
 - vi. Pintlar Corporation, formerly known as the Bunker Hill Company, and all predecessors, successors, subsidiaries, and affiliates;
 - vii. Sunshine Mining Company and all predecessors, successors, subsidiaries, and affiliates;
 - viii. Sunshine Precious Metals, Inc. and all predecessors, successors, subsidiaries, and affiliates;
 - ix. Coeur d'Alene Mining Company and all predecessors, successors, subsidiaries, and affiliates;
 - x. Callahan Mining Company and all predecessors, successors, subsidiaries, and affiliates;
 - xi. Union Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;
 - xii. Northern Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;
 - xiii. Burlington Northern Railroad and all predecessors, successors, subsidiaries, and affiliates;
 - xiv. Any other companies, entities, or persons that have owned or operated mines in the Coeur d'Alene Basin of northern Idaho.
- d. Provide all documents concerning your involvement in any contracts or other agreements relating to mining activities in the Coeur d'Alene Basin, including but not limited to:

i. All contracts for the processing of ore or concentrates at Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

ii. All documents related to the shipment of ore or concentrates to Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

iii. All documents related to the shipment of ore or concentrates to you from Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

iv. All documents related to any specifications, requirements or procedures for the processing of ore or concentrates at the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

v. All documents related to the ownership of ore or concentrates you shipped to, or received from, the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

No documents related to this request were discovered during the search conducted on behalf of Group R Co.

e. Provide all documents related to your financing of any business involved in mining activities in the Coeur d'Alene Basin.

All documents related to the financing of any business involved in mining activities in the Coeur d'Alene Basin by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

f. Provide all documents related to your ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

All documents related to the ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin by

Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

g. Provide all documents related to your participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

All documents related to the participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin by Golconda Lead Mines, Inc., Golconda Mining Corporation and Golconda Corporation are being provided herewith.

3. Information About Others

a. If you have information concerning operations within the Coeur d'Alene Basin or the source, content, or quantity of materials placed/disposed within the Coeur d'Alene Basin that is not included in the information you have already provided, provide all such information.

To the best of Group R Co.'s knowledge, all responsive documents, to the extent they exist, have been provided herewith.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

N/A.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement, or other handling of materials at, or transportation of materials to, the Coeur d'Alene Basin.

N/A.

4. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

Group R Co. has reviewed all documents within its custody and control that were believed to contain information responsive to this information request.

i. the names of all individuals consulted;

N/A.

ii. the current job title and job description of each individual consulted;

N/A.

iii. the job title and job description during the period being investigated of each individual consulted;

N/A.

iv. whether each individual consulted is a current or past employee of Respondent;

N/A.

v. the names of all divisions of Respondent for which records were reviewed;

The historical records of Group R Co. are centrally located and all of these records were searched.

vi. the nature of all documents reviewed;

The documents reviewed represented the historical records of any activities related to mining in the Coeur d'Alene mining district.

vii. the locations where those documents reviewed were kept prior to review; and

The records were stored in off-site storage facilities in Chicago, Illinois and on-site at the offices of The Marmon Group, Inc. in Chicago Illinois.

viii. the location where those documents reviewed are currently kept.

The original records remain at these locations.

INTRODUCTION

This document constitutes the response of The Marmon Corporation ("Marmon Corporation") to an information request received from the U.S. EPA on or about July 2, 1997. Pursuant to agreement with U.S. Department of Justice attorney Elizabeth Loeb, this response is to be served on or before July 25, 1997. The information contained herein was derived solely from historical documents currently within the possession and control of Marmon Corporation. Marmon Corporation has made a good faith effort to understand and interpret the documents in order to be responsive to the specific questions asked by U.S. EPA. However, the "facts" set forth in this response are not based on personal knowledge of anyone currently employed by Marmon Corporation and Marmon Corporation reserves the right to supplement or amend these answers should new and verifiable information contradict or require modifications to the interpretation given to the available documents.

GENERAL OBJECTIONS

1. While Marmon Corporation recognizes that the U.S. EPA is under a court-ordered deadline for making decisions concerning the addition of parties to ongoing litigation related to the Coeur d'Alene Basin, Marmon Corporation objects to the minimal amount of time which it was provided to research and prepare responses to this information request. Marmon Corporation has made its best efforts in the limited amount of time provided to accurately respond to this request.

2. The information relied upon to respond to this information request was gathered solely from historical documents maintained by Marmon Corporation. Given the time limits for answering this request, it is unreasonable and unduly burdensome (as well as practically impossible) to list all documents relied upon in preparation of each answer. However, all documents relied upon to prepare the answers have been provided herewith. The documents provided have been organized by the number of the question to which they respond. However, the fact that a particular document has been labeled for a particular question or questions does not mean that it does not contain information relevant to other questions and should not be taken as an admission that Marmon Corporation has any liability for the current condition of the Coeur d'Alene Basin.

3. Marmon Corporation objects to the definition of the term "You" or "Respondent" on the grounds that it is overbroad and calls for a legal conclusion as to what are "predecessor or successor corporations or companies."

4. Marmon Corporation objects to the instruction requiring it to seek out former employees or agents as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

5. Marmon Corporation objects to the instruction requiring it to continually supplement its response as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

M2377/59
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6. Marmon Corporation will provide a privilege log for any responsive documents that it has not produced as quickly as practically possible given the short time frame for responding.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. Provide the full legal name and mailing address of the Respondent.

**The Marmon Corporation.
225 West Washington Street
Chicago, IL 60606
Attn. Robert W. Webb, Esq.**

- b. For each person answering these questions on behalf of Respondent, provide:

These responses were prepared by Marmon Corporation's counsel.

- i. full name;

Lowenstein, Sandler, Kohl, Fisher & Boylan

- ii. title;

N/A.

- iii. business address;

**65 Livingston Avenue
Roseland, NJ 07068**

- iv. business telephone number and FAX machine number.

**(973) 992-8700 (phone)
(973) 992-5820 (fax)**

- c. If Respondent wishes to designate an individual for all future correspondence concerning this Facility, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.

Michael J. Rodburg, Esq.
Lowenstein, Sandler, Kohl, Fisher & Boylan
65 Livingston Avenue
Roseland, NJ 07068
(973) 992-8700 (phone)
(973) 992-5820 (fax)

d. State every address within the Coeur d'Alene Basin at which the Respondent conducted business during the period being investigated¹.

Marmon Corporation objects to the term "conducted business" as vague and ambiguous. Notwithstanding this objection, Marmon Corporation has never conducted business within the Coeur d'Alene Basin.

e. State the dates during which it conducted business at each such location.

N/A.

f. Describe the nature of Respondent's current business at each such location, including, but not limited to, a brief description of the major products or services Respondent manufactures or provides.

N/A.

g. List the Standard Industrial Classification (SIC) code for the business at each location.

N/A.

h. Describe the nature of the Respondent's business at each location during the period being investigated.

N/A.

2. Ownership Interests and Other Activities within the Coeur d'Alene Basin

a. Provide all documents relating to the following activities occurring within the Coeur d'Alene Basin:

i. Your ownership or leasing of mines;

¹ If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

N/A.

ii. Your operation of mines;

N/A.

iii. Your ownership or leasing of mining claims and patents;

N/A.

iv. Your ownership or leasing of mills, smelter complexes, or other facilities in which ore is processed or refined;

N/A.

v. Your operation of mills, smelter complexes, or other facilities in which ore is processed or refined;

N/A.

vi. Your transportation of ore, mining wastes, or other materials related to mining activities;

N/A.

vii. Information concerning the generation, use, purchase, treatment, processing, refinement, discharge, storage, disposal, placement, or other handling of mining wastes and/or materials at, or transportation of mining wastes and/or materials to, the Coeur d'Alene Basin;

N/A.

viii. Your ownership or leasing of real property where mine tailings and other mining waste have been discharged, deposited, stored, disposed of, or placed, or otherwise come to be located.

N/A.

b. Provide all environmental studies and/or audits regarding your involvement in the Coeur d'Alene Basin.

N/A.

c. Provide all documents related to any activities of the following entities in the Coeur d'Alene Basin:

Marmon Corporation objects to this request on the grounds that searching for documents related to the mining activities of the entities listed below in question 2(c)(i) - (xiv) is unduly burdensome and beyond the scope of U.S. EPA's authority pursuant to section 104(e) of CERCLA. Notwithstanding this objection, Marmon Corporation did discover certain documents during its document search that are responsive to this request and those documents are provided herewith.

- i. ASARCO, Inc. and all predecessors, successors, subsidiaries, and affiliates;
- ii. Hecla Mining Company and all predecessors, successors, subsidiaries, and affiliates;
- iii. Bunker Hill Limited Partnership and all predecessors, successors, subsidiaries, and affiliates;
- iv. Sullivan Mining Company and all predecessors, successors, subsidiaries, and affiliates;
- v. Gulf USA Corporation, formerly known as Gulf Resources & Chemical Corporation and all predecessors, successors, subsidiaries, and affiliates;
- vi. Pintlar Corporation, formerly known as the Bunker Hill Company, and all predecessors, successors, subsidiaries, and affiliates;
- vii. Sunshine Mining Company and all predecessors, successors, subsidiaries, and affiliates;
- viii. Sunshine Precious Metals, Inc. and all predecessors, successors, subsidiaries, and affiliates;
- ix. Coeur d'Alene Mining Company and all predecessors, successors, subsidiaries, and affiliates;
- x. Callahan Mining Company and all predecessors, successors, subsidiaries, and affiliates;
- xi. Union Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;
- xii. Northern Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;
- xiii. Burlington Northern Railroad and all predecessors, successors, subsidiaries, and affiliates;

xiv. Any other companies, entities, or persons that have owned or operated mines in the Coeur d'Alene Basin of northern Idaho.

d. Provide all documents concerning your involvement in any contracts or other agreements relating to mining activities in the Coeur d'Alene Basin, including but not limited to:

i. All contracts for the processing of ore or concentrates at Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

ii. All documents related to the shipment of ore or concentrates to Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

iii. All documents related to the shipment of ore or concentrates to you from Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

iv. All documents related to any specifications, requirements or procedures for the processing of ore or concentrates at the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

v. All documents related to the ownership of ore or concentrates you shipped to, or received from, the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

e. Provide all documents related to your financing of any business involved in mining activities in the Coeur d'Alene Basin.

Marmon Corporation has never provided financing directly for any business involved in mining activities in the Coeur d'Alene Basin. However, Marmon Corporation (through its predecessor company) did own stock in companies involved in mining activities in the Coeur d'Alene Basin and, on one occasion, purchased the shares of one mining company (Hecla Mining Company) directly from another (Golconda Corporation). To the extent that stock ownership or the

direct purchase of stock is considered indirect "financing", Marmon Corporation refers you to its response to question 2(f) below.

f. Provide all documents related to your ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

Marmon Corporation has provided documents responsive to this question herewith.

g. Provide all documents related to your participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

N/A.

3. Information About Others

a. If you have information concerning operations within the Coeur d'Alene Basin or the source, content, or quantity of materials placed/disposed within the Coeur d'Alene Basin that is not included in the information you have already provided, provide all such information.

To the best of Marmon Corporation's knowledge, all responsive documents, to the extent they exist, have been provided herewith.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

N/A.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement, or other handling of materials at, or transportation of materials to, the Coeur d'Alene Basin.

N/A.

4. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

Marmon Corporation has reviewed all documents within its custody and control that were believed to contain information responsive to this information request.

i. the names of all individuals consulted;

N/A.

ii. the current job title and job description of each individual consulted;

N/A.

iii. the job title and job description during the period being investigated of each individual consulted;

N/A.

iv. whether each individual consulted is a current or past employee of Respondent;

N/A.

v. the names of all divisions of Respondent for which records were reviewed;

The historical records of Marmon Corporation are centrally located and all of these records were searched.

vi. the nature of all documents reviewed;

The documents reviewed represented the historical records of any activities related to mining in the Coeur d'Alene mining district.

vii. the locations where those documents reviewed were kept prior to review; and

The records were stored in off-site storage facilities in Chicago, Illinois and on-site at the offices of The Marmon Group, Inc. in Chicago Illinois.

viii. the location where those documents reviewed are currently kept.

The original records remain at these locations.

INTRODUCTION

This document constitutes the response of The Marmon Group, Inc. ("Marmon Group") to an information request received from the U.S. EPA on or about July 2, 1997. Pursuant to agreement with U.S. Department of Justice attorney Elizabeth Loeb, this response is to be served on or before July 25, 1997.

PRELIMINARY STATEMENT

Marmon Group, a Delaware corporation incorporated on December 29, 1986, is a service corporation providing financial, legal and regulatory advice to member companies of The Marmon Group - an international association of more than 60 autonomous member companies engaged in manufacturing and service businesses worldwide. Marmon Group is not a holding company. Marmon Group has never engaged in any mining activities related to the Coeur d'Alene Basin and has never owned the stock of any company that ever engaged in any mining activity related to the Coeur d'Alene Basin.

GENERAL OBJECTIONS

1. While Marmon Group recognizes that the U.S. EPA is under a court-ordered deadline for making decisions concerning the addition of parties to ongoing litigation related to the Coeur d'Alene Basin, Marmon Group objects to the minimal amount of time it was provided to research and prepare responses to this information request. Marmon Group has made its best efforts in the limited amount of time provided to accurately respond to this request.

2. Marmon Group objects to the instruction requiring it to seek out former employees or agents as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

3. Marmon Group objects to the instruction requiring it to continually supplement its response as unreasonable, unduly burdensome and beyond the statutory authority of the U.S. EPA pursuant to section 104(e) of CERCLA.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. Provide the full legal name and mailing address of the Respondent.

The Marmon Group, Inc.
225 West Washington Street
Chicago, IL 60606
Attn. Robert W. Webb, Esq.

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- b. For each person answering these questions on behalf of Respondent, provide:

These responses were prepared by Marmon Group's counsel.

- i. full name;

Lowenstein, Sandler, Kohl, Fisher & Boylan

- ii. title;

N/A.

- iii. business address;

**65 Livingston Avenue
Roseland, NJ 07068**

- iv. business telephone number and FAX machine number.

**(973) 992-8700 (phone)
(973) 992-5820 (fax)**

- c. If Respondent wishes to designate an individual for all future correspondence concerning this Facility, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.

**Michael L. Rodburg, Esq.
Lowenstein, Sandler, Kohl, Fisher & Boylan
65 Livingston Avenue
Roseland, NJ 07068
(973) 992-8700 (phone)
(973) 992-5820 (fax)**

- d. State every address within the Coeur d'Alene Basin at which the Respondent conducted business during the period being investigated¹.

None.

- e. State the dates during which it conducted business at each such location.

¹ If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

N/A.

f. Describe the nature of Respondent's current business at each such location, including, but not limited to, a brief description of the major products or services Respondent manufactures or provides.

N/A.

g. List the Standard Industrial Classification (SIC) code for the business at each location.

N/A.

h. Describe the nature of the Respondent's business at each location during the period being investigated.

N/A.

2. Ownership Interests and Other Activities within the Coeur d'Alene Basin

a. Provide all documents relating to the following activities occurring within the Coeur d'Alene Basin:

i. Your ownership or leasing of mines;

N/A.

ii. Your operation of mines;

N/A.

iii. Your ownership or leasing of mining claims and patents;

N/A.

iv. Your ownership or leasing of mills, smelter complexes, or other facilities in which ore is processed or refined;

N/A.

v. Your operation of mills, smelter complexes, or other facilities in which ore is processed or refined;

N/A.

vi. Your transportation of ore, mining wastes, or other materials related to mining activities;

N/A.

vii. Information concerning the generation, use, purchase, treatment, processing, refinement, discharge, storage, disposal, placement, or other handling of mining wastes and/or materials at, or transportation of mining wastes and/or materials to, the Coeur d'Alene Basin;

N/A.

viii. Your ownership or leasing of real property where mine tailings and other mining waste have been discharged, deposited, stored, disposed of, or placed, or otherwise come to be located.

N/A.

b. Provide all environmental studies and/or audits regarding your involvement in the Coeur d'Alene Basin.

N/A.

c. Provide all documents related to any activities of the following entities in the Coeur d'Alene Basin:

Marmon Group objects to this request on the grounds that searching for documents related to the mining activities of the entities listed below in question 2(c)(i) - (xiv) is unduly burdensome and beyond the scope of EPA's authority pursuant to section 104(e) of CERCLA. Notwithstanding this objection, all responsive documents within the custody and control of Marmon Group, if any, would have been provided with the responses of Group R Co., Inc. and/or The Marmon Corporation.

i. ASARCO, Inc. and all predecessors, successors, subsidiaries, and affiliates;

ii. Hecla Mining Company and all predecessors, successors, subsidiaries, and affiliates;

iii. Bunker Hill Limited Partnership and all predecessors, successors, subsidiaries, and affiliates;

iv. Sullivan Mining Company and all predecessors, successors, subsidiaries, and affiliates;

v. Guila USA Corporation, formerly known as Gulf Resources & Chemical Corporation and all predecessors, successors, subsidiaries, and affiliates;

vi. Pintlar Corporation, formerly known as the Bunker Hill Company, and all predecessors, successors, subsidiaries, and affiliates;

vii. Sunshine Mining Company and all predecessors, successors, subsidiaries, and affiliates;

viii. Sunshine Precious Metals, Inc. and all predecessors, successors, subsidiaries, and affiliates;

ix. Coeur d'Alene Mining Company and all predecessors, successors, subsidiaries, and affiliates;

x. Callahan Mining Company and all predecessors, successors, subsidiaries, and affiliates;

xi. Union Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;

xii. Northern Pacific Railroad and all predecessors, successors, subsidiaries, and affiliates;

xiii. Burlington Northern Railroad and all predecessors, successors, subsidiaries, and affiliates;

xiv. Any other companies, entities, or persons that have owned or operated mines in the Coeur d'Alene Basin of northern Idaho.

d. Provide all documents concerning your involvement in any contracts or other agreements relating to mining activities in the Coeur d'Alene Basin, including but not limited to:

i. All contracts for the processing of ore or concentrates at Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

ii. All documents related to the shipment of ore or concentrates to Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

iii. All documents related to the shipment of ore or concentrates to you from Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

iv. All documents related to any specifications, requirements or procedures for the processing of ore or concentrates at the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

v. All documents related to the ownership of ore or concentrates you shipped to, or received from, the Bunker Hill Mining Company and all predecessors, successors, subsidiaries, and affiliates;

N/A.

e. Provide all documents related to your financing of any business involved in mining activities in the Coeur d'Alene Basin.

N/A.

f. Provide all documents related to your ownership of an interest in any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

N/A.

g. Provide all documents related to your participation in the management of any entity or business that owned or conducted mining activities in the Coeur d'Alene Basin.

N/A.

3. Information About Others

a. If you have information concerning operations within the Coeur d'Alene Basin or the source, content, or quantity of materials placed/disposed within the Coeur d'Alene Basin that is not included in the information you have already provided, provide all such information.

N/A.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these

questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

N/A.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement, or other handling of materials at, or transportation of materials to, the Coeur d'Alene Basin.

N/A.

4. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

N/A.

i. the names of all individuals consulted;

N/A.

ii. the current job title and job description of each individual consulted;

N/A.

iii. the job title and job description during the period being investigated of each individual consulted;

N/A.

iv. whether each individual consulted is a current or past employee of Respondent;

N/A.

v. the names of all divisions of Respondent for which records were reviewed;

N/A.

vi. the nature of all documents reviewed;

N/A.

vii. the locations where those documents reviewed were kept prior to review; and

N/A.

viii. the location where those documents reviewed are currently kept.

N/A.

REQUEST FOR INFORMATION PURSUANT TO
CERCLA SECTION 104(g) COEUR D'ALENE BASIN, NORTHERN IDAHO
RESPONSES OF GROUP R CO., INC. AND THE MARMON CORPORATION

Log of Privileged Documents

<u>DATE</u>	<u>AUTHOR</u>	<u>ADDRESSEES</u>	<u>DESCRIPTION</u>	<u>PRIVILEGE</u>
Undated	N/A	Mr. Thompson	Memorandum re: Golconda's proposal to offer common shareholders the right to purchase shares of other stock owned by Golconda	AC; WP
4/24/74	J.H. Murphy, Esq.	C.G. Murphy	Memorandum re: Golconda tender offer, with attached drafts of form letters for Golconda shareholders	AC; WP
7/27/76	Jeffrey J. Lonsdale	Golconda Corporation - 1976 Tax Files	Memorandum re: Sale of Golconda Mining Corporation Securities	WP
7/25/73	N/A	N/A	Handwritten notes re: Golvest meeting	WP
2/12/74	John T. Leyden	Paul J. Bennett	Memorandum re: Golconda Corporation tax review	WP
4/3/74	C.M. Brennan, III	C.G. Murphy A. Wolfley P.J. Bennett S.R. French, Esq. R.F. Long J.H. Murphy	Memorandum re: Cerro's purchase of Golconda's Hecla Mining Company stock	AC; WP

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DATE	AUTHOR	ADDRESSEES	DESCRIPTION	PRIVILEGE
7/1/71	Woolvin Patten, Esq.	A.W. Thompson cc: W. Featherstone H.F. Magnuson M.J. Coen J.M. Stogin, Esq.	Letter re: Proposed rights offering of shares of Hecla and Alice Consolidated	AC; WP
11/29/71	J.M. Stogin, Esq.	John G. Miller	Letter re: Note No. 1 to the Alice Consolidated Mines, Inc. financial statements	AC; WP
5/20/77	Thomas Seifert, Esq.	Howard L. Rosenberg	Letter re: Reincorporation of Golconda Corporation	AC; WP
4/18/84	Linda J. Battan	File	Memorandum re: Corporate history of Rego/ Golconda/Bastian Blessing/Pioneer Astro	WP
6/7/74	J.M. Stogin, Esq.	J. Hugh Murphy, Esq. cc: Gordon P. Smith Richard S. Sloma	Letter re: History of Golconda Corporation	AC; WP
5/9/77	Thomas Seifert, Esq.	The Shareholders of Golconda Corporation	Draft letter re: Notice of Annual Meeting of Shareholders on 6/1/77	WP

Note: All legal discussions in the Board of Directors and Executive Committee meeting minutes have been redacted.